



September 6, 2016

We are the Metropolitan Alliance for Workforce Equity (MAWE), a historic partnership between the Carpenters, Operating Engineers, Laborers, businesses, pre-apprenticeship programs, and community-based organizations. MAWE works to promote economic opportunity and equity in workforce and contracting, and develop practical strategies to address historic inequities. To support Portland's equity policies and provide a strong tool to implement the policies, these partners developed the Community Benefits Agreement (CBA) to create a framework for shared community oversight and accountability, fair labor standards, and goals and resources to increase contracting and workforce opportunities for historically underserved community members.

The goals of MAWE are to:

- Support the creation of good quality construction jobs and contracting opportunities in the Portland Metro area.
- Specifically connect these jobs and opportunities to historically underrepresented populations, including people of color and women.
- Sustain and grow the training and community infrastructure with resources in order to address the regional need for a trained, qualified, and diverse construction workforce and contractor pool.
- Work with partners, contractors and public owners to replicate best practices on construction projects to accomplish workforce and contracting equity.

In response to the EPA's request, MAWE hereby submits this letter with key recommendations. As a broad coalition of community partners we are working together to address the complex issues that have resulted in disparate impacts for communities of color, those with low-incomes, renters, workers, and minority- and women-owned small businesses. We are united in the belief that the benefits of public investments must be broadly shared, focused particularly on achieving equitable outcomes for communities who have historically been burdened by or currently experience displacement from public investments and development.

The Portland Harbor Superfund site cleanup represents a significant opportunity for historically underrepresented communities to gain skills and employment through the cleanup activities associated with this work.

We request that the EPA achieve equitable outcomes for diverse community members by holding this cleanup to a high standard, which includes: (1) true partnership between PRPs, community and labor partners; (2) transparency in process, strategy and outcomes; and (3) shared oversight and accountability measures where all parties (community, labor, contractors) are accountable for delivering on contracting and workforce equity goals. We believe the EPA's existing efforts and project goals regarding utilization of disadvantaged, minority, women and emerging small businesses (D/M/WBE and ESB), as well as the workforce diversity goals, are a good place to start, but lack key mechanisms that are critical to success. These mechanisms, which would indicate a true partnership with the community and help the EPA to efficiently meet any workforce and contracting equity goals, include:

- Development through a collaborative and transparent process between the EPA and the community
- Clear and explicit goal setting, for example: clearly tracking the diversity of the workforce at the apprentice and journey level, and by trade, to accurately measure the economic opportunities being created and for whom

- Built-in mechanisms to support the necessary capacity building in MWBE/DBE contracting and diversifying the workforce pipeline to achieve the stated goals
- Ongoing meaningful oversight and accountability of project goals through an Oversight Committee

The current proposed plan - Alternative I, however, provides little opportunity for historically impacted groups to benefit from the cleanup. Not only does this plan rely on fish consumption advisories rather than remediated habitat to ensure that people are not exposed to toxins, but it does not ensure that adequate funds will be available to generate cleanup jobs that will benefit impacted communities.

With a more thorough set of cleanup activities, the community could benefit directly from the economic opportunities that would be generated, leading to more local training and employment.

Instead of the current proposed plan - Alternative I - we call on the EPA to require stronger cleanup that will ultimately lift fish consumption advisories. We stand in solidarity with the Yakama Nation, the Portland Harbor Community Coalition, the Audubon Society, Willamette Riverkeeper, the Portland Harbor Community Advisory Group, and others with this request.

We believe that this is an incredible opportunity to create significant and positive community impact throughout the entire EPA superfund cleanup. There are current best practices around equitable contracting and diverse workforce development that could be used immediately to align project activities with the insight and resources of community stakeholders. We are concerned that the EPA is missing an opportunity to set a high standard in partnership with the community. Instead of being silent on any workforce or contracting components of the cleanup, we recommend you seriously consider including goals and targets to the plan related to the economic opportunity that will result from the cleanup activities, along with mechanisms and strategies to achieve those goals.

Thank you again for the opportunity to provide input and recommendations.

Sincerely,

The Metropolitan Alliance for Workforce Equity and Community Partners